

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 48 (MC2013-16)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2013-15

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(November 12, 2015)

The United States Postal Service hereby moves for temporary relief, to allow the existing contract in this docket to remain in effect for sixty (60) additional days. The customer whose competitive product rates were established in this docket wishes to renew its commitment to sending large volumes of Priority Mail for the next year at negotiated rates. By the terms of the contract filed in this docket, the current rates will expire on November 19, 2015.

The Postal Service and the customer have been working cooperatively over the past month to reach a new agreement, which would have avoided any interruption in the Postal Service's ability to provide this customer access to negotiated rates. However, the parties have concurrently been engaged in negotiations on other potential negotiated service agreements (NSAs), involving other products and services, which have delayed the progress toward finalizing the successor Priority Mail contract. The customer prefers to prioritize those other negotiations for the time being, and table the discussions on the Priority Mail successor contract through the busy holiday and peak mailing season. Nevertheless, the customer would like to continue to utilize the Postal Service's Priority Mail service at the negotiated rates during this time period.

Therefore, the Postal Service respectfully requests that the Commission grant a sixty (60) day extension to allow the existing contract to remain in effect. The sixty day time period would give the parties additional time to conclude negotiations on the other potential NSA opportunities and reach agreement on the successor Priority Mail contract during the busy holiday and peak mailing season. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for sixty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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